MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> Kreindler & Kreindler Ilp Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE ILC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

February 5, 2020

The Honorable Sarah Netburn Thurgood Marshall United States Courthouse 40 Foley Square, Room 430 New York, NY 10007

RE: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Yesterday, the Plaintiffs' Executive Committees ("PECs") wrote to Your Honor with a request for a three-week extension of the deadlines for the respective parties to serve expert reports (ECF No. 5837). After the letter was filed on ECF, two attorneys for defendants clarified that their consent to extend the deadlines referenced in the PECs' request was conditioned on including a request for a correlating extension for the completion of expert discovery. Accordingly, the PECs withdraw their previous request and are resubmitting a revised request, attached to this letter as Exhibit A, reflecting the request for the correlating extension of the deadline for completion of expert discovery.

Respectfully submitted,

KREINDLER & KREINDLER, LLP

By: /s/ Andrew J Maloney
Steven R. Pounian
Andrew J. Maloney
Kreindler & Kreindler, LLP
750 Third Avenue
New York, NY 10017
Tel: 212-687-8181

E-mail: amaloney@kreindler.com

On behalf of the MDL 1570 Plaintiffs' Exec. Committee for Personal Injury and Death Claims

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
Robert T. Haefele
Motley Rice LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel: (843) 216-9184

E-mail: rhaefele@motleyrice.com

On behalf of the MDL 1570 Plaintiffs' Exec. Committee for Personal Injury and Death Claims

Case 1:03-md-01570-GBD-SN Document 5844 Filed 02/05/20 Page 2 of 2

Honorable Sarah Netburn Page 2 February 5, 2020

COZEN O'CONNOR

By: /s/ Sean P. Carter

Sean P. Carter Cozen O'Connor One Liberty Place 1650 Market Street, Suite 2800 Philadelphia, PA 19103 Tel: (215) 665-2105

E-mail: scarter1@cozen.com

On behalf of the MDL 1570 Plaintiffs' Exec. Committee for Commercial Claims

cc: The Honorable George B. Daniels (via ECF) All Counsel of Record (via ECF)